

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION UNDER RULE 41 FOR A SEARCH WARRANT**

I, Brian E. Russ, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with Synchronoss Technologies user account **(260) 251-9281** that is stored at premises owned, maintained, controlled, or operated by Synchronoss Technologies, Inc., an electronic communications service and/or remote computing service provider headquartered at 200 Crossing Boulevard, 8th Floor, Bridgewater, NJ 08807. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Synchronoss Technologies, Inc. to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized person will review that information to locate the items described in Section II of Attachment B.

2. Your Affiant is a Special Agent of the Federal Bureau of Investigation, and, as such, is an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. Your Affiant is engaged in the enforcement of criminal laws and is within a category of officers authorized by the Attorney General to request and execute search warrants pursuant to Title 18, U.S.C., Section 3052 and 3107; and DOJ regulations set forth at Title 28, C.F.R., Sections 0.85 and 60.2(a).

3. I have been a Special Agent with the FBI since 1999. I am currently assigned to the FBI Cleveland Division, Lima Resident Agency. Prior to this, I was assigned to the FBI Albuquerque Division, Las Cruces Resident Agency. I was previously employed as a Police Officer with the Anderson Police Department, Anderson, Indiana from 1994 to 1999. During my tenure as a law enforcement officer I have investigated a wide range of state and federal criminal violations, including those involving violent crime, gang activity, drug trafficking, and crimes against children matters. Since 1994, I have received training and have experience in interviewing and interrogation techniques, arrest procedures, search and seizure, search warrant applications, and various other crimes and investigation techniques.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. §§ 2251 and 2252A, Sexual Exploitation of Children and Receipt of Child Pornography, respectively, exists in the information associated with the above listed Synchronoss Technologies user account **(260) 251-9281**. There is also probable cause to search the information described in Attachment A for evidence and instrumentalities of this crime further described in Attachment B.

JURISDICTION

6. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), &

(c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

BACKGROUND CONCERNING SYNCHRONOSS TECHNOLOGIES, INC.

7. Synchronoss Technologies, Inc. (dba Synchronoss) is a company specializing in personal cloud storage and mobile content transfer with web based and mobile applications. Synchronoss allows users of their personal cloud service to back up, sync and restore functionality; protect photos, videos, messages, documents, contacts and music, as well as to access content everywhere and share photos, videos and even important documents that are too large to email and manage what’s shared and who has access.

8. Synchronoss users, upon uploading, submitting, disclosing or distributing content of any kind through the Synchronoss website or one of its services, acknowledge that the content will not be treated confidentially. The Synchronoss Terms of Use specifically establish rules and conduct for the use of the service to include an agreement that users will not upload, post, submit or otherwise distribute or facilitate distribution of any content (including text, communications, software, images, sound, data or other information) that is unlawful, threatening, abusive, harassing, defamatory, libelous, deceptive, fraudulent, invasive of another’s privacy, tortious, obscene, profane or which otherwise violates the Terms of Use or any law in any jurisdiction. Synchronoss may immediately terminate a user’s access to the service and reserves the right to disclose any information as necessary to satisfy any applicable law, regulation, legal process or governmental (including law enforcement) request.

PROBABLE CAUSE

9. On February 2, 2023, Federal Bureau of Investigation (FBI) Task Force Officer (TFO) Derek Dennis became aware of information that Ralph Pickering of Celina, Ohio was

caught in an online undercover sting operation by a YouTuber called Skeeter Jean (@therealskeeterjean). This individual who identifies himself on YouTube as Skeeter Jean conducts his own private investigations and sting operations to capture online sexual predators of minors. Skeeter Jean then posts a video of the matter on his YouTube channel. Upon reviewing the YouTube video it was revealed that Pickering communicated with someone who he thought was a 13-year-old female. Pickering engaged in sexually explicit conversation and asked for nude images of the minor. The video documentary revealed that Pickering traveled to Cincinnati, Ohio on November 12, 2022 and was captured via hidden video operated by Skeeter Jean meeting with the girl who Pickering thought was 13 years old. The person playing the role of Skeeter Jean came out of a closet and confronted Pickering. The Cincinnati Police Department was called and they conducted an interview with Pickering off camera. Pickering was released and there was no additional investigation.

10. Your Affiant contacted Pickering's wife, Julie Pickering, who confirmed that she and other family members were made aware of the Skeeter Jean YouTube video. She filed for divorce in the summer of 2022 and served Pickering with a Protection Order after seeing the YouTube video. Julie Pickering obtained the chat messages from Skeeter Jean and forwarded them to your Affiant. Julie Pickering also confirmed Pickering's cellphone was **(260) 251-9281**.

11. The chat messages received from Julie Pickering that were represented to be from Ralph Pickering were over an application called KIK. Pickering's KIK name was "grounds keeper." The messages began on October 26, 2022 where Pickering said he was from Celina and asked if the person did "hookups" to meet for a drink or coffee. The person then said they were "13" and Pickering said he was "57." On October 27, 2022, Pickering said, "You're very pretty too. And if you ever change your mind and wanna hook up, I'm all good with that." Pickering

then sent a photograph of himself in a button up shirt, zipper black hoodie, and ballcap. Your Affiant has reviewed this image and positively identified the person depicted in the photograph as Ralph Pickering.

12. Further review of the chat messages shows that on October 29, 2022, Ralph Pickering asked to see pictures of the 13-year-old, said he wanted to know more about her, and asked, “Are you a virgin or do you have experience?” The person then sent Pickering an image of a female with brown and blue hair. Pickering said, “Damn you’re adorable!! Yes I would like to hook up with you.” Pickering said he could not wait to see her as long as there was no police involvement. Pickering later asked, “Would you rather lose your virginity at home or in a hotel?” and asked where her mother would be. Pickering said, “I can’t wait to do it to you!! I can’t wait to touch your naked body, your soft skin. Do you keep your pussy shaved?” Pickering asked how big her breasts were and said, “Let me see them, small ones are what I like.” On November 1, 2022, Pickering said, “Wish you would share some naughty pics.” Pickering then told her several times to take pictures and that some girls really get into taking pictures of themselves once they get started doing it.

13. Further review of the chat messages shows that on November 9, 2022, Pickering asked for her address and discussed going to meet with her. Pickering said, “I can’t wait to see you, hold you, kiss you, go down on you and finally make love to you. It will be amazing. I can’t wait to feel your tight, tiny little pussy stretching around my cock.” On November 12, 2022, Pickering sent several messages asking for her address and said, “Come on Becca I’m down here, Please give me an address.” The person then sent the address of 761 Morgan Street, Cincinnati, Ohio, which was one of the last messages before Pickering arrived.

14. Your Affiant obtained a report from the Cincinnati Police Department which stated on November 12, 2022 officers were sent to 761 Morgan Street, Cincinnati, Ohio for a possible “sex sting” and that a person from Celina, Ohio traveled to this address to meet with a 13-year-old female. The report identified Ralph Pickering, born July 7, 1965 of Celina, Ohio as the person who was at 761 Morgan Street, Cincinnati, Ohio. After determining that the sting operation was conducted by a private party the officers took a photograph of Pickering and his vehicle, and then released him without any additional investigation.

15. After reviewing this information, your Affiant looked up Ralph Pickering in the Ohio Law Enforcement Gateway, a records system for Ohio Driver’s License Information. Upon reviewing the OHLEG for Pickering it was revealed that Patrolman Jacob Steinbrueck, New Albany Police Department, New Albany, Ohio, checked Pickering's OHLEG on November 10, 2022.

16. Your Affiant contacted Officer Steinbrueck who advised that on August 30, 2022 he was on his online undercover profile utilizing the KIK application when he was messaged by a user that had a display name of “grounds keeper” and a user name of “groundskeeper65.” Officer Steinbrueck later sent a subpoena to KIK and obtained subscriber information for “grounds keeper” revealing a Gmail registration address of rpickering1965@gmail.com. He also sent a subpoena to Google for subscriber information of this e-mail address and found the billing information on the Google account was for Ralph Pickering.

17. Officer Steinbrueck engaged in conversation with Pickering over KIK between August 30, 2022 and November 12, 2022. Pickering stated that he was a 50-year-old male in “Midwest Ohio.” Officer Steinbrueck established his profile as a 14-year-old female from Columbus, Ohio. Immediately after, Pickering asked, “Dam have you been with older men?”

When asked if he has been with anyone this young Pickering replied, “I’ve never been with a girl as young as you! What are you looking to do in here m” and “Do you want to?” Officer Steinbrueck questioned what Pickering meant by “Do you want to?” and Pickering stated, “Be with an older man.”

18. The conversation continued the next day with Pickering asking,
“What grade are you in?”
“Do you want to be with an older man? What are you looking for on here?”
“Have you had sex before”
“Are you wanting to hook up with someone on here?” and
“So would you meet someone from here for sex?”

19. Pickering asked for a picture of the undercover profile and then sent a photo of himself. Pickering stated that he lives in Celina and became worried about law enforcement on the application while chatting with Officer Steinbrueck. Pickering then continued to ask questions such as, “Are you on the pill?” and “Are you developed very much?” Pickering again stated his concern about law enforcement by stating, “Oh, I would like to keep this between you and me too. Kind of illegal what we’re talking about. (winking face emoji)”

20. Pickering’s questions become more direct in asking what sexual acts Officer Steinbrueck’s undercover profile has done by asking, “Have you ever been eaten out?” followed by “Have you thought about meeting me any?” Pickering wanted to know if the undercover profile was excited or scared to meet and when Officer Steinbrueck replied, “excited,” Pickering stated, “It excites me as well! Like a lot. That scares me!!” Pickering asked if the undercover profile had any naked pictures and if any could be sent to him and referenced back to the

statement of, “Have you ever been eaten out?” by stating “It’s making me hard just thinking about eating you out.”

21. Pickering continued to push for a nude photo either just wanting a photo of the breast or of the vaginal area and no face. Once no photo of this nature was sent, Pickering asked “So if you’re not on the pill you will insist on me wearing a condom?” Pickering then began to bring up meeting in person by stating, “Lol ok. It will be exciting that’s for sure. We have to figure out how and when we can do it. Where do you live in Columbus?” followed by “I will have to come down, get a motel or hotel that’s close and either you can walk or I can meet you somewhere and pick you up.”

22. Once the conversation shifted to possibly meeting, Pickering began to worry about getting the undercover profile pregnant when they have sex and also saying that it excites him. Pickering said “what happens IF, while we’re having sex the condom gets pulled to much or what ever and breaks. We will have to plan this out around your period.” Followed by, “Plus what would we do if it does break and you get pregnant? That would be a very bad situation.” And, “But I’m sitting here getting hard thinking about you getting pregnant. I guess it’s that risk thing that I like to take.”

23. The conversation continued with Pickering worrying about the undercover profile becoming pregnant and then about him engaging in sexual activity with the undercover profile. Pickering said, “I can’t wait to struggle to get it inside you, and watching you squirm as it slides in. At first it’s going to be really hard to get in. But it’ll go. I hope it’s not too much pain for you.” And, “I can’t wait to suck on your clit and rub my tongue across it like I do and watch you react as you cum several times.”

24. The conversation continued with Pickering wanting to come down, meet and engage in sexual conduct as well as asking for nude photos of the undercover profile. Pickering again showed his concern for getting caught by law enforcement but continued to want to meet and engage in sexual conduct with the undercover profile.

25. During the conversation Pickering gave a phone number “567-279-2530” so texting could occur when he comes to New Albany. Pickering then gave a day he wanted to come down and meet and asked about the undercover profile’s ovulation cycle as he worried about the undercover becoming pregnant. The age of the undercover profile was stated again as 14 years old and Pickering confirmed this in the KIK chat and then continued by talking about the sexual activities he wanted to conduct with the undercover profile.

26. The messages show that Pickering planned to get a hotel in New Albany at the Home2 Suites, but the morning of the scheduled meet Pickering said that he no longer wanted to come down.

27. On November 15, 2022, Officer Steinbrueck obtained subscriber information from KIK for account “grounds keeper.” KIK advised the Account Name was “grounds keeper”, Username was “groundskeeper65”, and the e-mail address was rpickering1965@gmail.com. The account was registered on November 16, 2019. On February 8, 2021, a Samsung android cellular device, Model SM-G973U, was listed on the account. Several IP Addresses were provided by KIK for when “grounds keeper” used KIK. One of the IP addresses used during the time Pickering used KIK to communicate with Officer Steinbrueck’s undercover profile was 68.65.102.11.

28. On February 7, 2023, an administrative subpoena was sent to Com Net, Inc in Wapakoneta, Ohio for subscriber information for IP Address 68.65.102.11. Com Net, Inc., an

Internet provider in Wapakoneta, Ohio provided subscriber information for IP Address 68.65.102.11 as Julie Pickering and joint account holder Ralph Pickering, telephone number **(260) 251-9281**.

29. On February 6, 2023, your Affiant also obtained subscriber information from KIK. The same information that Officer Steinbrueck obtained (referenced in paragraph 27 above) was obtained regarding the subscriber information. The information revealed that on January 28, 2023, a Samsung android cellular device, Model SM-G973U, was listed on the account. An IP Address was obtained for a recent date of Pickering's use of KIK, which was IP 174.193.117.224 on February 2, 2023.

30. On February 7, 2023, an administrative subpoena was sent to Verizon for subscriber information for IP Address 174.193.117.224. The subscriber was listed as Ralph Pickering, 7257 Staeger Road, Celina, Ohio 45822, Verizon number **(260) 251-9281**, and a registered device as a Samsung Galaxy S10, 128GB, IMEI 358090103015524.

31. On March 17, 2023, a preservation letter was issued to Synchronoss Technologies, Inc. for account **(260) 251-9281**. Synchronoss Technologies, Inc. confirmed the account of **(260) 251-9281**, that it contained data, and that it would be preserved.

32. On March 16, 2023, Pickering was contacted at his place of employment in St. Mary's, Ohio. He agreed to meet with investigators at the St. Mary's Police Department. Pickering was interviewed and admitted to the conversations over KIK mentioned herein. Pickering indicated that he believed he was communicating with minors, that he engaged in sexually explicit conversations with those supposed minors, and that he asked for nude images of these minors. Pickering had his Samsung Galaxy S10, IMEI 358090103015524, and telephone number **(260) 251-9281** with him. He consented to Agents taking possession of this device and

conducting a search of the device. A search of the device revealed that the KIK Application had been purchased on July 4, 2020, however, was no longer physically on the device. (Note: Your Affiant also sent a request to KIK on February 7, 2023 to preserve data and content on Pickering's "grounds keeper" account. KIK responded that they only retain data for 30 days past a user's last date of activity, and therefore there was no information or content available.)

33. In summary, the information herein reflects that Ralph Pickering has a Samsung cellular telephone with cellular telephone number **(260) 251-9281**, and with Verizon service. Furthermore, Verizon's cloud storage is maintained by Synchronoss Technologies who verified that **(260) 251-9281** is an account with Cloud Storage that has been preserved per an FBI Preservation Request. Additionally, it has been established that Pickering used this Samsung cellular device to install a KIK application, and that he used that KIK application to engage in sexually explicit conduct with who he thought were 13- and 14-year-old girls. It is likely that Synchronoss Technologies, Inc. has additional information, images, videos, and other files which may reveal content associated with the sexual exploitation of children.

34. This search warrant is being sought to obtain this additional information, which is information that is likely to provide additional evidence identifying dates, times, usernames, and/or other information related to files associated with the sexual exploitation of children.

CONCLUSION

35. Based on the forgoing, I request that the Court issue the proposed search warrant.

36. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Synchronoss Technologies, Inc. Because the warrant will be served on Synchronoss Technologies, Inc., who will then compile the requested records at a time

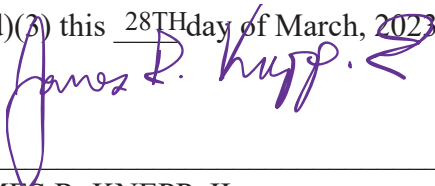
convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,



Brian E. Russ
Special Agent
Federal Bureau of Investigation

Sworn to via telephone after submission by
reliable electronic means. Fed.R.Crim.P.4.1 and
41(d)(3) this 28TH day of March, 2023.



JAMES R. KNEPP, II
UNITED STATES DISTRICT JUDGE